

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) ANTJUAN L. MARTIN,)	
)	
Plaintiff,)	
)	Case No. CIV-13-1064-D
v.)	
)	
(1) CITY OF OKLAHOMA CITY,)	
(2) BILL VETTER,)	
(3) RYAN SORRELS,)	
(4) RUSSELL MOCK,)	
(5) JACOB MCCLAIN,)	
(6) WILLIAM CITY,)	
)	
Defendants.)	

**OBJECTIONS OF DEFENDANTS, OKLAHOMA CITY POLICE
LIEUTENANT BILL VETTER, LIEUTENANT RYAN SORRELS,
SERGEANT RUSSELL MOCK AND SERGEANT JACOB MCCLAIN TO
DEFENDANT CITY OF OKLAHOMA CITY'S EXHIBIT LIST**

COME NOW the defendants, Oklahoma City Police Lieutenant Bill Vetter, Lieutenant Ryan Sorrels, Sergeant Russell Mock and Sergeant Jacob McClain, and object to defendant City of Oklahoma City's exhibit list as follows:

OBJECTIONS TO EXHIBITS

No.	Exhibit	Objection
7	Plaintiff's medical records	Objections reserved pending plaintiff's production of those medical records.

9	Video recording of incident	Lack of authenticating or identifying evidence, FRE 901; further, the referenced video, as produced by plaintiff to these defendants, fails to record the entire incident at issue in this lawsuit; original photograph (videotape is included in the definition of photograph) required, FRE 1002
11	Relevant OCPD Policies, Procedures, Rules and Training	Relevancy; FRE 401, 402, 403 (violation of police regulation is insufficient to state a claim alleging a constitutional violation, <i>i.e.</i> , excessive force). <i>Romero v. Board of County Commissioners</i> , 60 F.3d 702, 705 (10 th Cir. 1995))

Respectfully submitted,

/s/ Susan Ann Knight

Susan Ann Knight, OBA #14594

Stacey Haws Felkner, OBA #14737

Manchester & Knight, PLLC

One Leadership Square, Suite 800 N

211 North Robinson

Oklahoma City, Oklahoma, 73102

Telephone: (405)235-4671

Facsimile: (405)235-5247

Oklahoma City Police Lieutenant Bill Vetter,
Lieutenant Ryan Sorrels, Sergeant Russell Mock
and Sergeant Jacob McClain

CERTIFICATE OF MAILING

This is to certify that on this 4th day of November, 2014, a true and correct copy of the above and foregoing was served on the following, who are registered participants of the ECF System:

Nathan H. Harper
4901 W. Reno, #270041
Oklahoma City, OK 73137

Richard C. Smith
Jennifer Warren
Municipal Counselor's Office
200 North Walker
Oklahoma City, OK 73102

/s/ Susan Ann Knight
Susan Ann Knight